

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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INNOVATION VENTURES, LLC;  
LIVING ESSENTIALS, LLC and INTERNATIONAL  
IP HOLDINGS, LLC,

Case No. 12 Civ.5354 (KAM)

Plaintiffs,

**NOTICE OF MOTION TO  
ADMIT COUNSEL PRO HAC  
VICE**

- against -

ULTIMATE ONE DISTRIBUTING CORP., ET AL.

Defendants.

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To: PATTERSON BELKNAP WEBB & TYLER LLP  
Geoffrey Potter  
Christos G. Yatrakis  
Thomas P. Kurland  
Michelle Cohen  
Jonah M. Nobler  
Alexander Michaels  
Jeremy A. Weinberg  
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PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the certificates of good standing annexed thereto, we will move this Court pursuant to Rule 1.3(c) of the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, partner with the firm of Plunkett Cooney and a member in good standing of the Bar of the State of Michigan, and I am also admitted to practice and in good standing in the United States District Court for the Eastern District of Michigan, the United States District Court for the Western District of Michigan, and the United States District Court for the Northern District of Indiana, as attorney pro hac vice to argue or try this case in whole or in part as counsel for Defendants Universal Wholesale, Inc. and Joseph Sevany, Sr., a.k.a. Joe Zaitouna. There are no pending disciplinary proceedings against me in any state or federal court.

Respectfully Submitted,

PLUNKETT COONEY



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By: Michael J. Barton (P34509)  
Attorney for Defendants  
Universal Wholesale, Inc. and  
Joseph Sevany, Sr., a.k.a. Joe Zaitouna  
38505 Woodward Avenue, Ste. 2000  
Bloomfield Hills, MI 48304  
Telephone: 248-901-4000  
Facsimile: 248-901-4040  
[mbarton@plunkettcooney.com](mailto:mbarton@plunkettcooney.com)

Dated: December 6, 2012

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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INNOVATION VENTURES, LLC;  
LIVING ESSENTIALS, LLC and INTERNATIONAL  
IP HOLDINGS, LLC,

Case No. 12 Civ.5354 (KAM)

Plaintiffs,

**AFFIDAVIT IN SUPPORT OF  
MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

- against -

ULTIMATE ONE DISTRIBUTING CORP., ET AL.

Defendants.

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STATE OF MICHIGAN      )  
                              ) SS  
COUNTY OF OAKLAND    )

MICHAEL J. BARTON, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the law firm of Plunkett Cooney.
2. I submit this affidavit in support of my motion for admission to practice pro hac vice in the above captioned matter.
3. As shown in the Certificates of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Michigan, and I am also admitted to practice and in good standing in the United States District Court for the Eastern District of Michigan, the United States District Court for the Western District of Michigan, and the United States District Court for the Northern District of Indiana.

4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate pro hac vice in this one case for Defendants Universal Wholesale, Inc. and Joseph Sevany, Sr., a.k.a. Joe Zaitouna.

Respectfully Submitted,

PLUNKETT COONEY



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By: Michael J. Barton (P34509)  
Attorney for Defendants  
Universal Wholesale, Inc. and  
Joseph Sevany, Sr., a.k.a. Joe Zaitouna  
38505 Woodward Avenue, Ste. 2000  
Bloomfield Hills, MI 48304  
Telephone: 248-901-4000  
Facsimile: 248-901-4040  
[mmcknight@plunkettcooney.com](mailto:mmcknight@plunkettcooney.com)

Dated: December 6, 2012

Subscribed and sworn to before  
me this 6th day of December, 2012

Janet M. Behrik  
Janet M. Behrik, Notary Public  
Wayne County, Michigan, Acting Oakland  
My Commission Expires: 6-14-14

JANET M. BEHK  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF WAYNE  
MY COMMISSION EXPIRES JUN 14, 2014  
ACTING IN COUNTY OF OAKLAND

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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INNOVATION VENTURES, LLC;  
LIVING ESSENTIALS, LLC and INTERNATIONAL  
IP HOLDINGS, LLC,

Case No. 12 Civ.5354 (KAM)

Plaintiffs,

**ADMISSION TO PRACTICE  
PRO HAC VICE**

- against -

ULTIMATE ONE DISTRIBUTING CORP., ET AL.

Defendants.

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The motion for admission to practice pro hac vice in the above captioned matter is granted. The admitted attorney, Michael J. Barton, is permitted to argue or try this particular case in whole or in part as counsel or advocate for Defendants Universal Wholesale, Inc. and Joseph Sevany, Sr., a.k.a. Joe Zaitouna.

This Order becomes effective upon the Court's receipt of the required \$25.00 fee and confirms your appearance as counsel in this case. A notation of your admission pro hac vice in the above listed case will be made on the roll of attorneys.

Dated: \_\_\_\_\_

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UNITED STATES DISTRICT JUDGE

cc: Pro Hac Vice Attorney  
Court File

# State Bar of Michigan

## Certificate of Good Standing

This certifies that Michael J. Barton, P34509 of Bloomfield Hills, Michigan is an active member of the State Bar of Michigan in good standing.

He/She was admitted to practice in Michigan on November 23, 1982 in Macomb County and became a member of the State Bar of Michigan on November 23, 1982.



A handwritten signature in black ink.

Janet K. Welch, Executive Director  
November 14, 2012

**United States District Court  
Eastern District of Michigan**

**CERTIFICATE OF GOOD STANDING**

*I, David J. Weaver, Clerk of Court, certify that*

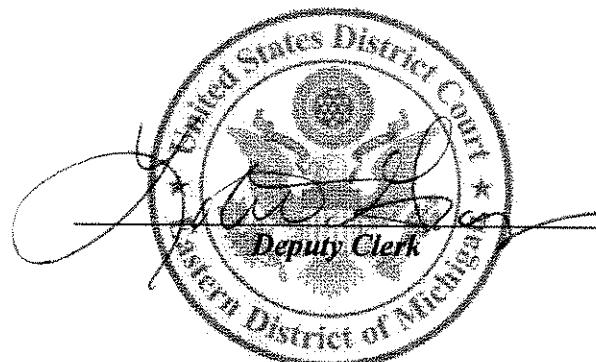
***MICHAEL J. BARTON***

*was duly admitted to practice in this Court on 12/07/1982,  
and is in good standing as a member of the Bar of this Court.*

*Dated at Detroit, Michigan on 11/14/2012.*

*David J. Weaver*

*Clerk*



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
OFFICE OF THE CLERK  
[www.miwd.uscourts.gov](http://www.miwd.uscourts.gov)

399 Federal Bldg. 110 Michigan St., NW Grand Rapids, MI 49503 (616) 456-2381	B-35 Federal Bldg. 410 W. Michigan Ave. Kalamazoo, MI 49007 (269) 337-5706	113 Federal Bldg. 315 W. Allegan St. Lansing, MI 48933 (517) 377-1559	229 Federal Bldg. 202 W. Washington St. Marquette, MI 49855 (906) 226-2021
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## CERTIFICATE OF GOOD STANDING

I, Tracey Cordes, Clerk of the United States District Court  
for the Western District of Michigan, do hereby certify that

MICHAEL J. BARTON

was duly admitted to practice in said Court on May 27, 1997  
and is in good standing as a member of the bar of said Court.

Tracey Cordes, Clerk

Dated at Grand Rapids,  
Michigan, on November 15, 2012

By:

  
Deputy Clerk

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

INDIANA

**CERTIFICATE OF  
GOOD STANDING**

I, Robert N. Trgovich, Clerk of this Court,

certify that Michael J. Barton, Bar # P34509,

was duly admitted to practice in this Court on

April 30, 2012, and is in good standing  
*DATE*

as a member of the Bar of this Court.

Dated at Fort Wayne, Indiana on December 3, 2012.  
*LOCATION*                   *DATE*

  
CLERK

  
DEPUTY CLERK